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January 3, 2025

By ECF

The Honorable Vincent L. Briccetti
United States District Court Judge for the
Southern District of New York
300 Quarropas Street, Room 630
White Plains, NY 10601

Re: *Rodriguez et al. v. International Business Machines
Corp. (7:21-CV-09928)*
Joint Status Report on Settlement

Dear Judge Briccetti:

Counsel for the 16 individual Plaintiffs and for Defendant IBM submit this joint letter to update the Court regarding their progress on completing settlement.

On November 5, 2024, the Court ordered all deadlines stayed while the parties worked to complete their tentative settlement that would result in the dismissal of this case with prejudice and with no award of attorney's fees or costs. Since that Order, the parties have reached full agreement on all monetary and non-monetary terms and conditions and all 16 Plaintiffs have executed written settlement agreements.

Under the terms of the settlement, we expect Plaintiffs will file a stipulation of dismissal by about February 17, 2025. The Parties propose that the Court order them to submit a status report on Friday, February 28,

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2025, to advise the Court regarding the status of settlement, if the case has not already been voluntarily dismissed by that date.

If this proposed schedule meets with Your Honor's approval, a "So Ordered" line is provided below for the Court's convenience.

Respectfully submitted,

/s/ Matthew W. Lampe

Matthew W. Lampe
Attorney for Defendant

/s/ David G. Webbert

David G. Webbert
Attorney for Plaintiffs

cc: Matthew W. Lampe
Kristina A. Yost
Erika D. Cagney

Attorneys for Defendant

IT IS SO ORDERED.

DATE: _____

Hon. Vincent L. Briccetti
United States District Court Judge